

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JEANNE DEGAN,
Plaintiff,

v.

**GOLDWELL OF NEW
ENGLAND, INC.,**
Defendant.

CIVIL ACTION NO. 04CV11024 RWZ

Jonathan R. Sigel
BBO# 559850

**JOINT STATEMENT FOR RULE 16
SCHEDULING CONFERENCE**

Pursuant to Rule 16.1 of the Local Rules of the United States District Court for the District of Massachusetts and the Court's Order for Scheduling Conference, the parties submit the following Joint Statement.

I. PROPOSED PRE-TRIAL SCHEDULE

<u>Pre-Trial Event</u>	<u>Agreed, Proposed Event Dates</u>
Voluntary Disclosures Served	July 14, 2004
Amendments and/or Supplements to Pleadings	August 1, 2004
Written Discovery (Not Including Requests for Admissions) and Non-Expert Depositions Completed	February 1, 2005
Service of Requests for Admissions	March 1, 2005
Rule 26(a)(2)(B) Disclosure of Trial Expert by Plaintiff	February 1, 2005
Rule 26(a)(2)(B) Disclosure of Trial Expert by Defendant	March 1, 2005

Expert Depositions (if any) Completed	April 1, 2005
Summary Judgment Motions or Other Dispositive Motions Filed	May 1, 2005
Opposition (if any) to Summary Judgment or Other Dispositive Motions Filed	June 1, 2005
Pre-Trial Conference, In or About	July 2005

II. CERTIFICATIONS BY PARTIES AND COUNSEL

See Defendant's Certification attached hereto. Plaintiff's Certification to follow.

III. OTHER MATTERS

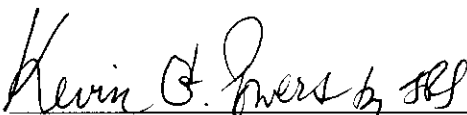
- A. The parties have considered trial by Magistrate Judge and do not consent to same.
- B. A written settlement proposal will be presented by Plaintiff to Defendant on or before June 28, 2004, and defense counsel will be prepared to respond to the proposal at the Scheduling Conference.

JEANNE DEGAN

GOLDWELL OF NEW ENGLAND, INC.

By her attorneys,

By its attorneys,



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Dated: June 24, 2004

I hereby certify that a true copy of the
above document was served upon the
attorney of record for each party by
mail/hand on 6-24-04

